

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:		: Bankruptcy No. 22-12041-AMC
Vladimir Albert,		: Chapter 13
<i>Debtor.</i>		:
Nationstar Mortgage LLC		:
<i>Movant,</i>		:
vs.		:
Vladimir Albert		:
Veronica Albert (Non-Filing Co-Debtor)		:
<i>Debtors/Respondents,</i>		:
and		:
Kenneth E. West, Esquire,		:
<i>Trustee/Respondent.</i>		:

CERTIFICATION OF DEFAULT

AND NOW, comes secured Creditor, Nationstar Mortgage LLC (“Movant”) by and through its counsel, Hladik, Onorato & Federman, LLP, and files this Certification of Default to obtain an order for Relief from the Automatic Stay due to Debtor’s failure to comply with the terms of the Stipulation resolving a Motion for Relief from Stay, and avers the following:

1. On October 9, 2024, the attached Stipulation was approved by the Court. See Exhibit “A” attached.
2. Debtors have not continued to make the post-petition payments as required by the Stipulation. This default is the third time the Debtor has defaulted on the Stipulation.
3. Per the terms of the Stipulation (paragraph 5), Debtor’s opportunity to cure the default shall be limited to two (2) occurrences and upon the third occurrence, Movant may file a Certification of Default with the Court without notice to Debtor or Debtor’s Counsel. A copy of the first (1st) and second (2nd) notices are attached, collectively, as Exhibit “B” and are hereby incorporated by reference.

4. As of the date of the filing of this Certification of Default, more than ten (10) days have passed and the default has not been cured. Movant has not received the following payments:

Regular Monthly Payments (April 1, 2025 through May 1, 2025 at \$1,415.78 each).....	\$2,831.56
Attorney's fees for Certification of Default.....	\$250.00
Suspense Balance.....	(\$136.36)
TOTAL POST-PETITION ARREARS.....	\$2,945.20

WHEREFORE, Movant respectfully requests this Honorable Court ORDER that Movant be granted Relief from the Automatic Stay.

Respectfully Submitted:

/s / Danielle Boyle-Ebersole, Esquire
Danielle Boyle-Ebersole, Esquire
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